

PETER S. CHRISTIANSEN, ESQ.
Nevada Bar No. 5254
pete@christiansenlaw.com
R. TODD TERRY, ESQ.
Nevada Bar No. 6519
tterry@christiansenlaw.com
KEELY A. PERDUE, ESQ.
Nevada Bar No. 13931
keely@christiansenlaw.com
CHRISTIANSEN LAW OFFICES
810 S. Casino Center Blvd., Suite 104
Las Vegas, Nevada 89101
Tel: (702) 240-7979
Fax: (866) 412-6992
Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KEVIN BROWN, an individual; JENNIFER
BROWN, an individual;

Plaintiffs,

v.

SAM'S WEST, INC.; ADVANTAGE
SALES AND MARKETING, LLC and
DOES 1 through 100;

Defendants.

Case No. 2:15-cv-01964-LDG-CWH

**STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME FOR
PLAINTIFFS TO FILE OPPOSITION TO
DEFENDANT SAM'S WEST, INC.'S
MOTION TO EXCLUDE PLAINTIFFS'
EVIDENCE AND DAMAGES RELATED
TO PLAINTIFF JENNIFER BROWN'S
CLAIM OF LOSS OF CONSORTIUM
PURSUANT TO FRCP 37 AND ANY
JOINDERS THERETO**

Pursuant to Local Rules IA 6-1, 6-2, and LR 7-1, the undersigned counsel of record for Plaintiffs, Kevin Brown and Jennifer Brown, Defendant, Sam's West, Inc., and Defendant, Advantage Sales & Marketing, LLC, hereby STIPULATE to extend the time for Plaintiffs to file an Opposition to Defendant Sam's West, Inc.'s Motion to Exclude Plaintiffs' Evidence and Damages Related to Plaintiff Jennifer Brown's Claim of Loss of Consortium (ECF No. 82) (the "Motion") and any joinders thereto. Defendant Sam's West, Inc. filed its Motion on November 14, 2017. Defendant Advantage Sales & Marketing, LLC filed a Joinder to the Motion on November 15, 2017. (ECF No. 83). Plaintiffs' Opposition is currently due on November 28,

2017. If approved, the foregoing parties have agreed to a one-day extension to file the Opposition, which would make it due on November 29, 2017. This is the first stipulation seeking to extend the Opposition deadline.

Plaintiffs submits that good cause exists to approve the requested stipulation as the requested one-day extension will provide Plaintiffs with sufficient time to address the arguments raised by Defendant Sam's West, Inc. in the Motion.

DATED this 27th day of November, 2017.

CHRISTIANSEN LAW OFFICES

/s/ Keely A. Perdue, Esq.
By _____
PETER S. CHRISTIANSEN, ESQ.
R. TODD TERRY, ESQ.
KEELY A. PERDUE, ESQ.
Attorneys for Plaintiffs

DATED this 28th day of November, 2017.

PHILLIPS, SPALLAS & ANGSTADT, LLC

/s/ Pooja Kumar, Esq.
By _____
ROBERT K. PHILLIPS, ESQ.
Nevada Bar No. 11441
POOJA KUMAR, ESQ.
Nevada Bar No. 12988
502 South Ninth Street
Las Vegas, NV 89101
Attorneys for Defendant Sam's West, Inc.

DATED this 27th day of November, 2017.

MURCHISON & CUMMING, LLP

/s/ Michael J. Nunez, Esq.
By _____
MICHAEL J. NUNEZ, ESQ.
Nevada Bar No. 10703
BRYAN J. URE, ESQ.
Nevada Bar No. 11004
350 South Rampart Blvd., Suite 320
Las Vegas, NV 89145
Attorneys for Defendant Advantage Sales & Marketing, LLC

IT IS SO ORDERED.

By  _____
UNITED STATES MAGISTRATE JUDGE

Dated: November 29, 2017

CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5 and the Court's Local Rules, the undersigned hereby certifies that on this 28th day of November, 2017, a copy of the foregoing document entitled **STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR PLAINTIFFS TO FILE OPPOSITION TO DEFENDANT SAM'S WEST, INC.'S MOTION TO EXCLUDE PLAINTIFFS' EVIDENCE AND DAMAGES RELATED TO PLAINTIFF JENNIFER BROWN'S CLAIM OF LOSS OF CONSORTIUM PURSUANT TO FRCP 37 AND ANY JOINDERS THERETO** was filed and served through the Court's electronic filing system (CM/ECF) upon all registered parties and their counsel.



An employee of Christiansen Law Offices